

THE STATE OF ALABAMA
~~MOBILE COUNTY.~~
BALDWIN COUNTY

DETINUE BOND AND AFFIDAVIT.

KNOW ALL MEN BY THESE PRESENTS, That We, Service Trust Company,
a corporation, as Principal and Fidelity & Deposit Company of
Maryland, as Surety

are held and firmly bound unto Justin Reed Matthews

his heirs, executors and administrators, in the
sum of ONE THOUSAND FIVE HUNDRED AND no/100 (\$1,500.00) Dollars, for
the payment of which, we bind ourselves, our and each of our heirs, executors, and administrators, jointly
and severally, firmly by these presents.

Sealed with our seals and dated this 25th day of October, A. D. 1965

The Condition of the above Obligation is such, That whereas the above bounden
Service Trust Company, a corporation has, on

the 25th day of October 1965, sued out from the office of the
Clerk of the Circuit Court of Baldwin County
~~Mobile~~, in the State of Alabama, a Writ of Detinue, returnable to the present
term of said Circuit Court of Baldwin County ~~Mobile~~ against the said Justin Reed Matthews

for the recovery of the following property.

to-wit One (1) 1959 Model Villa
Mobil Home, 45' x 10'
House trailer, serial number or Identification
number 1045-1973

NOW, if the said Service Trust Company, a corporation shall fail
in said suit, and shall pay to the said Justin Reed Matthews
the defendant in said writ all such costs and damages as he may sustain by the wrongful suing out of said
Writ of Detinue, then this obligation to be void, otherwise to remain in full force and benefit.

SERVICE TRUST COMPANY, A CORPORATION

J. F. Stearns (Seal)
FIDELITY & DEPOSIT COMPANY, (Seal)
OF MARYLAND,
BY: William J. Demore (Seal)

FILED

OCT 26 1965

ALICE L. DUCK, CLERK
REGISTER

approved 10-26-65
W. J. Demore
car

THE STATE OF ALABAMA,
~~MOBILE COUNTY~~
Baldwin County

DETINUE AFFIDAVIT

PERSONALLY appeared before me, ~~John F. Stallworth, Clerk of the Circuit Court for Baldwin County,~~ Notary Public Baldwin

J. F. Stallworth

who, being duly sworn deposes and says, that the property sued for in the complaint of

Service Trust Company, a corporation

to-wit: One (1) 1959 Model Villa

Mobil Home, 45' x 10'

House trailer, serial number or identification

number 1045=1973

belongs to Service Trust Company, a corporation the said Plaintiff.

Sworn to and subscribed the 25th day
of October, 19 65, before me.

B. F. Stallworth Clerk

NOTARY PUBLIC

J. F. Stallworth

No. 6740

CIRCUIT COURT

~~MOBILE COUNTY~~

BALDWIN COUNTY

Service Trust Company, a
corporation
VS. } Detinue Affidavit
and Bond

Justin Reed Matthews

Filed 26 day of Oct 1965

Greg J. Smith
Clerk Circuit Court, ~~Mobile County~~
Baldwin
County

Attorney

SERVICE TRUST COMPANY, a
corporation,

Plaintiff

VS

JUSTIN REED MATTHEWS,
and various other John Does
and Richard Roes, whose names
are otherwise unknown than as
stated, but whose name or names
will be furnished later, when
and if ascertained, jointly and
individually, defendants

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY

) ALABAMA

) AT LAW

) CASE NO. 6740

Plaintiff claims of the defendant the following described
personal property, viz:

One (1) 1959 Model Villa, mobil home
45' x 10' house trailer, serial number
or identification number 1045-1973

with the value of the use thereof during the detention, viz:

From, to-wit, September 5, 1965, said above described property
being the property of the plaintiff.

B. F. Stokes, III

B. F. STOKES, III
Attorney for Plaintiff
P. O. Box 293
Mobile, Alabama

Serve the defendant
Robertsdale, Alabama

(note to sheriff's department: the wife of the defendant operates
a dress shop in Robertsdale, which is located next door to the
residence of the defendant. This house trailer is located to
the rear of the dress shop or the rear of the residence. There
may be another house trailer also located there, but the house
trailer involved in this suit is yellow and white in color.)

FILED

SEP 13 1965

CLERK'S REGISTER

DEFINUE SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

No. 6740

To Any Sheriff of the State of Alabama:

You Are Hereby Commanded to Summon Justin Reed Matthews

to appear within thirty days from the service of this writ, in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the complaint of

Service Trust Company, A Corp

Witness my hand this 26th day of October, 1965.

David J. Leach, Clerk.

COMPLAINT

Plaintiff Versus Defendant

The plaintiff claims of the defendant the following personal property, to-wit:

Complaint Attached hereto

with the value of the hire or use thereof during the detention, to-wit:

from , 19, to , 19

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

SERVICE TRUST COMPANY, a corp

Plaintiff.

VS.

JUSTIN REED MATTHEWS

Defendant.

DETINUE SUMMONS AND COMPLAINT

Filed 10-26, 19 65

/ Alice J. Duck, Clerk.

B. F. Stokes III
Plaintiff's Attorney

Defendant's Attorney

To The Sheriff of Said County:

Whereas, the Plaintiff in the within stated cause has made affidavit and given bond as required by law you are hereby required to take the property mentioned in Complaint into your possession unless the Defendant gives bond payable to the Plaintiff with sufficient surety in double the amount of the value of the property, with condition that if the Defendant is cast in the suit he will within thirty days thereafter, deliver the property to the Plaintiff, and pay all damages and costs which may accrue from the detention thereof.

Alice J. Duck, Clerk.

*Executed by attaching
the writ in described
property & leaving with
Reed Matthews at home
Oct. 26 1965*

*Taylor Wilkins Sheriff
W. P. Barnes C. D. S.*

Defendant lives at

RECEIVED
Received in Office

OCT 26 1965, 19.

TAYLOR WILKINS
SHERIFF Sheriff.

I have executed this summons

this Oct. 26, 1965

by leaving a copy with

*Justin Reed Matthews
attached 1-1959 model
Volkswagon Beetle 45410
house trailer 1045-1973.
Case settled*

Taylor Wilkins, Sheriff
Barnes, Deputy Sheriff

GIBBONS & STOKES

ATTORNEYS AT LAW

201 AMERICAN NATIONAL BANK BUILDING

BIENVILLE OFFICE

MOBILE, ALABAMA

TELEPHONE 433-2611

E. GRAHAM GIBBONS
B. F. STOKES, III

October 25, 1965

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA, 36601

Mrs. Alice J. Duck, Clerk
Circuit Court
Baldwin County, Alabama
Bay Minette, Alabama

Re: Service Trust Company, a corp. vs Justin Reed
Matthews

Dear Mrs. Duck:

The above is a detinue suit and I enclose a complaint and a detinue bond, with affidavit. You will recall that recently, you have approved this bondsman, Fidelity and Deposit Co. of Maryland, whose local surety is W. K. P. Wilson Insurance Agency.

My client is very anxious to obtain this property as soon as possible and I would appreciate your kindness in submitting the complaint and summons, etc, to the sheriff, on October 26, if at all possible.

Your many kindnesses are always appreciated.

Sincerely yours,


B. F. Stokes, III

BFS:l
Encl: complaint and detinue bond, etc.

GIBBONS & STOKES

ATTORNEYS AT LAW

201 AMERICAN NATIONAL BANK BUILDING

BIENVILLE OFFICE

MOBILE, ALABAMA

TELEPHONE 433-2611

E. GRAHAM GIBBONS
B. F. STOKES, III

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA. 36601

Mrs. Alice J. Duck, Clerk
Circuit Court
Baldwin County, Alabama
Bay Minette, Alabama

Re: Service Trust Company vs Justin Reed Matthews

Dear Mrs. Duck:

The above case has been settled. Please enter an order of dismissal and kindly send me your bill of cost.

Your generous cooperation is appreciated.

Sincerely yours,


B. F. Stokes, III

BFS:jrc